

Exhibit G

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July 24, 2019

VIA EMAIL AND FED EX

Eun Young Choi
Thane Rehn
Parker Tobin
Michael Parker
United States Attorney's Office
Southern District of New York
1 St. Andrew's Plaza
New York, NY 10007

Re: United States v. von der Goltz, 18 Cr. 693 (RMB)

Dear Counsel,

We write on behalf of Defendant Harald Joachim von der Goltz regarding his production of documents from [REDACTED]. The documents contained on the enclosed pen drive are Bates stamped [REDACTED] to [REDACTED] and consist of scanned versions of hard-copy documents received from [REDACTED]'s archives and electronic documents received from [REDACTED]. The document beginning with Bates stamp [REDACTED] is an index [REDACTED] provided, which we understand relates to boxes of hard-copy documents we received. The table below provides the Bates ranges that correspond to the identification number contained on each box we received from [REDACTED]:

Identification Number on Box	Beginning Bates Number	Ending Bates Number
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]

quinn emanuel urquhart & sullivan, llp

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[illegible]

The remaining documents, [REDACTED] to [REDACTED], are electronic documents we received from [REDACTED].

With this production, Mr. von der Goltz hereby waives any claim of attorney-client privilege and work product protection over these documents, and he further waives any such claims over advice he received from [REDACTED] *except* to the extent that such advice

involved defending against a criminal investigation into Mr. von der Goltz. We understand that the prospect of a criminal investigation into Mr. von der Goltz arose on June 7, 2016, which is when Mr. von der Goltz retained Jeff Neiman as his criminal counsel. We further understand that, from that point forward, [REDACTED]'s role on behalf of Mr. von der Goltz in the criminal investigation into Mr. von der Goltz essentially was to support Mr. von der Goltz's criminal counsel by obtaining documents and other information necessary for criminal counsel to represent Mr. von der Goltz. As a result, [REDACTED]'s communications after June 7, 2016 with Mr. Neiman or any other lawyer representing Mr. von der Goltz in this case or the criminal investigation that preceded this case, work product created at criminal counsel's direction, or communications [REDACTED] had in the course of assisting criminal counsel's representation of Mr. von der Goltz are not within the scope of this waiver. To the extent that [REDACTED] provided advice to Mr. von der Goltz on matters other than this case or the investigation that preceded it, that advice is within the scope of the waiver.

Mr. von der Goltz is waiving privilege as described above because we may argue to the jury that the government cannot establish beyond a reasonable doubt that Mr. von der Goltz had the required *mens rea* with respect to the charges in the indictment because lawyers at [REDACTED] were aware of all material facts relating to the pertinent legal, tax, and financial structures of the von der Goltz family and provided Mr. von der Goltz legal advice on a variety of topics relevant to his state of mind regarding his tax obligations. The time period of these documents is the entire time that either [REDACTED] or lawyers at [REDACTED] represented Mr. von der Goltz, which we understand began in approximately 1981. The relevant topics of advice are all those within the scope of the waiver described above, including those pertinent to the allegations of tax evasion, wire fraud, money laundering, failure to file FBARs, and false statements.

As discussed above, we received these documents from [REDACTED] in response to our request for their files relating to advice provided to Mr. von der Goltz. As such, Mr. von der Goltz is within his rights to waive privilege over them. Should you have any questions about the origin of these materials, we would direct you to [REDACTED] or its counsel at [REDACTED].

Please let us know if you have any difficulty accessing the production.

Sincerely,

/s/ Daniel Koffmann
Daniel Koffmann

cc: Bill Lovett, Bob Buehler (counsel to Defendant Richard Gaffey)

[REDACTED]